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Attorneys for Defendant  
JOEY DONALD STEWART CAMPBELL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:21-cr-00206-DJC
	)	
Plaintiff,	)	STIPULATION AND PROPOSED ORDER TO
	)	CONTINUE SENTENCING HEARING AND
vs.	)	SCHEDULE OF DISCLOSURE FOR PSR
	)	
JOEY DONALD STEWART	)	Date: July 18, 2024
CAMPBELL,	)	Time: 9:00 a.m.
	)	Judge: Hon. Daniel J. Calabretta
Defendant.	)	

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IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, U.S. Attorney Phillip A. Talbert, through Assistant United States Attorney Roger Yang, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Megan T. Hopkins, attorney for defendant Joey Donald Stewart Campbell, that the previously-scheduled sentencing hearing date of July 18, 2024, be continued to **September 12, 2024**, at 9:00 a.m, and that the disclosure schedule be modified as follows to permit additional time for the completion of the presentence report (PSR):

Draft PSR Disclosed on August 1, 2024  
Informal Objections due August 15, 2024  
Final PSR filed August 22, 2024  
Formal Objections due August 29, 2024  
Replies due September 5, 2024

Due to physical challenges presented in arranging for an in-person interview of Mr. Campbell, who suffers from traumatic brain injury (TBI) and is currently working to revise his pain management protocol, the defendant has now waived an in-person interview and will provide written information to the probation officer, as well as a written statement accepting responsibility for the offense conduct and signed releases to permit an investigation into his financial condition and background records. The probation officer will require some additional time to finalize the draft report and disclose it to the parties. The proposed modification to the disclosure schedule and continued sentencing date will permit sufficient time for the completion of the PSR in advance of sentencing in this matter. Therefore, it is the request of the parties that the Court grant the requested continuance and modify the disclosure schedule as set forth above.

Respectfully submitted,

Dated: May 16, 2024

HEATHER E. WILLIAMS  
Federal Defender

/s/ Megan T. Hopkins  
MEGAN T. HOPKINS  
Assistant Federal Defender  
Attorney for Defendant  
JOEY DONALD STEWART CAMPBELL

Dated: May 16, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ Roger Yang  
ROGER YANG  
Assistant U.S. Attorney  
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order.

Dated: May 17, 2024

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE